

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE METHYL TERTIARY BUTYL ETHER  
PRODUCTS LIABILITY LITIGATION

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88

**This document pertains to:**

*City of New York v. Amerada Hess Corp., et al.*, No.  
04-CIV-3417

**DECLARATION OF MICHAEL J. DILLON IN SUPPORT OF DEFENDANT EXXON  
MOBIL CORPORATION'S MOTION TO EXCLUDE TESTIMONY AND OPINION OF  
MARTIN TALLETT**

Michael J. Dillon, an attorney duly admitted to practice law in the State of New York and in this Court, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of McDermott Will & Emery LLP, counsel for the Exxon Mobil Defendants in the above-captioned matter. I submit this Declaration in support of Defendant Exxon Mobil Corporation's Motion To Exclude Testimony And Opinion Of Martin Tallett (hereinafter "Motion"). This Declaration authenticates the exhibits attached hereto and relied on in support of the Motion. In accordance with this Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 13, 2009.

2. Attached hereto as Exhibit A are true and correct copies of relevant pages from the deposition transcript of Martin Tallett, who was deposed in this matter on April 29, 2009.

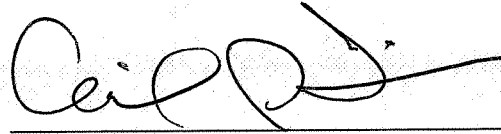
3. Attached hereto as Exhibit B is a true and correct copy of The Expert Market Share Report of Martin R. Tallett, filed in this matter on March 16, 2009.

4. Attached hereto as Exhibit C is a true and correct copy of the Expert Report of Martin R. Tallett, filed in this matter on December 19, 2008.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY  
May 13, 2009

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Dillon", written over a horizontal line.

Michael J. Dillon